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8 Attorney for Plaintiff

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10 **UNITED STATES DISTRICT COURT**  
**EASTERN DISTRICT OF CALIFORNIA**

11 Carlos Garcia, } Case No. 1:20-cv-00924-BAK (SKO)  
12 Plaintiff, } STIPULATION AND [PROPOSED]  
13 vs. } ORDER FOR EXTENSION OF  
14 } TIME  
15 Kilolo Kijakazi, Acting } (Doc. 23)  
16 Commissioner of Social Security, }  
17 Defendant. }  
18  
19

20  
21 IT IS HEREBY STIPULATED, by and between the parties through their  
22 respective counsel of record, with the Court's approval, that Plaintiff shall have a  
23 30-day extension of time, from January 14, 2022 to February 14, 2022, for Plaintiff  
24 to serve on defendant with PLAINTIFF'S REPLY BRIEF. All other dates in the  
25 Court's Scheduling Order shall be extended accordingly.

26 This is Plaintiff's second request for an extension of time. Good cause  
27 exists for this request. Counsel for the Plaintiff is currently in Houston, Texas due  
28 to a family emergency involving Counsel's father who is gravely ill with

1 Leukemia. (See Declaration by Dolly M. Trompeter). Counsel for the Plaintiff is  
2 a principal caregiver. Additionally, Counsel has limited access to her computer and  
3 will require additional time to brief this matter upon her return to California.

4 Counsel for Plaintiff attempted to obtain Defendant's position on this motion  
5 but did not receive a response. Counsel apologizes to the Defendant and Court for  
6 any inconvenience this may cause.

7  
8 Respectfully submitted,

9 Dated: January 6, 2022 PENA & BROMBERG, ATTORNEYS AT LAW  
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11 By: /s/ Dolly M. Trompeter  
12 DOLLY M. TROMPETER  
13 Attorneys for Plaintiff

14  
15 Dated: January 6, 2022 PHILLIP A. TALBERT  
16 United States Attorney  
17 PETER K. THOMPSON  
18 Acting Regional Chief Counsel, Region IX  
19 Social Security Administration

20 By: \*/s/ Oscar Gonzalez de Llano  
21 Oscar Gonzalez de Llano  
22 Special Assistant United States Attorney  
23 Attorneys for Defendant  
24 (\*As authorized by email on January 6, 2022)

## ORDER

Based upon the foregoing stipulation of the parties (Doc. 23), and for good cause appearing (Fed. R. Civ. P. 16(b)(4)),

IT IS HEREBY ORDERED that Plaintiff shall have an extension of time, to and including February 14, 2022, in which to file Plaintiff's reply in support of motion for summary judgment.

IT IS SO ORDERED.

Dated: January 14, 2022

/s/ Sheila K. Oberto

UNITED STATES MAGISTRATE JUDGE